

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

MARICEL FORTEZA,

Plaintiff,

v.

PELICAN INVESTMENT HOLDINGS  
GROUP, LLC DBA AAP AND AUTO  
SERVICE DEPARTMENT, US DEALER  
SERVICES, INC. DBA US AUTO,  
PALMER ADMINISTRATIVE  
SERVICES, INC., SING FOR SERVICE,  
LLC DBA MEPCO

Defendants.

Case No. 4:23-CV-00401-ALM-KPJ

**JURY TRIAL DEMANDED**

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Plaintiff respectfully requests that she be provided up to and including January 10, 2024, to respond or otherwise address Defendant Sing for Service, LLC DBA MEPCO's Motion to Dismiss. Plaintiff just recently retained counsel and counsel requires the additional time to evaluate the matter and determine the best action in the interest of his client moving forward, which may involve seeking leave to file an amended complaint in this matter.

Plaintiff has conferred with Counsel for the Defendants, who do not oppose the requested relief.

Dated: **December 27, 2023**

/s/

Andrew R. Perrong, Esq.  
*Plaintiff Pro-Se*  
1657 The Fairway #131  
Jenkintown, PA 19046  
Phone: 215-791-6957  
Facsimile: 888-329-0305  
andyperrong@gmail.com

**CERTIFICATE OF SERVICE**

Counsel for Plaintiff certifies that on December 27, 2023, he filed the foregoing on the Court's CM/ECF system, which will send electronic notification to all counsel of record.

Dated: **December 27, 2023**

\_\_\_\_\_/s/\_\_\_\_\_  
Andrew R. Perrong, Esq.  
*Plaintiff Pro-Se*  
1657 The Fairway #131  
Jenkintown, PA 19046  
Phone: 215-791-6957  
Facsimile: 888-329-0305  
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**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff certifies that on December 26, 2023, he met and conferred with counsel for the Defendants as required by Local Rule CV-7(h). The motion is unopposed.

Dated: **December 27, 2023**

\_\_\_\_\_/s/\_\_\_\_\_  
Andrew R. Perrong, Esq.  
*Plaintiff Pro-Se*  
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**JURY TRIAL DEMANDED**

**[PROPOSED] ORDER ON MOTION FOR EXTENSION OF TIME**

**THIS CAUSE** came before the Court upon Plaintiff's Unopposed Motion for Extension of Time (the "Motion"), and the Court being duly advised in the premises does hereby **FIND, ORDER AND ADJUDGE:**

1. The Plaintiff shall have until January 10, 2024 to respond to Defendant Sing for Service, LLC DBA MEPCO's Motion to Dismiss, either directly or by filing of an Amended Complaint in this action.

2. In the event Plaintiff desires, the Court expressly grants leave to file an Amended Complaint in this action on or including January 10, 2024.